



DEPARTMENT OF ECONOMIC SECURITY

Your Partner For A Stronger Arizona

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM CAREER ADVANCEMENT NETWORK (SNAP CAN)

POLICY MANUAL

Effective August 25, 2023



Innovative Workforce Solutions

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Table of Contents

Chapter 1: Introduction	1-1
I. Policy Statement	1
II. Applicability	1
III. Authority	1
IV. Acronyms and Definitions	1
V. Standards	2
A. Program Overview	2
B. Program Goals and Objectives	2
C. Program Contacts & Resources	3
Chapter 2: SNAP CAN Administration	2-1
I. Policy Statement	1
II. Applicability	1
III. Authority	1
IV. Acronyms and Definitions	1
V. Standards	11
A. FAA Screening for SNAP Benefits	11
B. Reverse Referral	2
C. SNAP CAN Participation	4
D. Allowable SNAP CAN Activities	44
E. Virtual SNAP CAN Services	5
F. Signatures for SNAP CAN Participant Forms	5
Chapter 3: Intake, Case Management, and ABAWD Policy	3-1
I. Policy Statement	1
II. Applicability	1
III. Authority	1
IV. Acronyms and Definitions	1
V. Standards	1
A. Enrollment	1
B. Case Management Services	3
C. ABAWD Informational Policy	4
D. Provider Determination	3-7
Chapter 4: Activity Components, Activity Verification, and Support Services	1

I.	Policy Statement	1
II.	Applicability	1
III.	Authority	1
IV.	Acronyms and Definitions	1
V.	Standards	1
	A. Activity Components	1
	B. Allowable SNAP CAN Component Activities	11
	C. Participant Component Activity Verification	5
	D. Case File Maintenance	6
	E. Support Services	88
	F. Support Services Categories and Amounts	9
	G. Tracking Support Services	4-11
Chapter 5: Monitoring and Auditing		1
I.	Policy Statement	1
II.	Applicability	1
III.	Authority	1
IV.	Acronyms and Definitions	5-1
V.	Standards	1
	A. Case Record Retention	1
	B. SNAP CAN Provider Program Monitoring	2
	C. FNS Reporting Requirements	7
	D. SNAP E&T Program Activity Report (FNS-583)	77
	E. Oversight Monitoring, Oversight and Reporting Measure	5-8
Chapter 6: DES Policies		6-1
I.	Policy Statement	1
II.	Applicability	1
III.	Authority	6-1
IV.	Acronyms and Definitions	1
V.	Standards	1
A.	Grievance/Issue Resolution	6-1
B.	Reporting Abuse and Neglect	6-2
C.	Confidentiality	6-2
D.	Americans with Disabilities Act	6-4
E.	Civil Rights	6-4
F.	Arizona Address Confidentiality Program	6-6
Chapter 7: Glossary		7-1
	A. Acronyms	7-1

ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Program: Supplemental Nutrition Assistance Program Career Advancement Network

Effective Date: August 25, 2023

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Chapter 1: Introduction

I. Policy Statement

This policy provides a program overview of the Supplemental Nutrition Assistance Program (SNAP) Career Advancement Network (CAN), Program goals, State agency contact information, and where to direct questions concerning policy and procedure.

II. Applicability

Unless otherwise noted, this policy applies to all contracted SNAP CAN provider staff and SNAP CAN State staff.

III. Authority

[Agricultural Act of 2014.](#)

[Agriculture Improvement Act of 2018.](#)

[Farm Security and Rural Investment Act of 2002.](#)

[Food and Nutrition Act of 2008.](#)

[Food Stamp Act of 1977](#), as amended to the [Food Security Act of 1985](#).

[Personal Responsibility and Work Opportunity Reconciliation Act of 1996.](#)

[7 CFR § 273](#) Work Provisions.

[Supplemental Nutrition Assistance Program Employment & Training \(SNAP E&T\) Program State Plan](#) (Annual).

IV. Acronyms and Definitions

Reference the [Glossary](#) for an explanation of the acronyms used in this Chapter, and for definitions of **Department of Economic Security, Division of Employment and Rehabilitation Services, Food and Nutrition Services, Participant, Participant Activity Spreadsheet, SNAP CAN Provider, SNAP Recipient, Supplemental Nutrition Assistance Program Employment and Training Program Supplemental Nutrition Assistance Program Career Advancement Network Program, and Support Services.**

V. Standards

A. Program Overview

1. The Arizona Department of Economic Security (DES) is the administrative and fiscal agent responsible for the SNAP Employment and Training (E&T) services. Within DES, the program is titled SNAP CAN. SNAP E&T services are administered through SNAP CAN within the Division of Employment and Rehabilitation Services (DERS), Workforce Development Administration (WDA).
2. SNAP E&T provides employment and training services for adults or family members 16 years or older in households receiving SNAP benefits. The objective is to help individuals gain skills and enter or move up in the workforce by achieving self-sufficiency through employment. Services such as vocational training, job search assistance, job readiness, education and support services are designed to enable individuals to achieve the objective.
3. DES established SNAP CAN, a third-party community-based employment and training partnership, which provides services to eligible SNAP recipients and connects participants with the tools and resources they need to overcome barriers and obtain employment.
4. DES applies the SNAP E&T 50/50 local and federal match-funding model. Within this model, the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) reimburses states 50 percent of the Federal Financial Participation (FFP) to support individuals receiving SNAP benefits to participate in allowable SNAP E&T activities.
5. SNAP CAN leverages existing employment and training expertise by partnering with local community-based organizations (SNAP CAN providers) contracted to deliver allowable services to SNAP participants. SNAP CAN providers meet SNAP participants where they are and provide meaningful, intentional opportunities toward career pathways to achieve self-sufficiency with living-wage employment.
6. The SNAP CAN Policy Manual details a standard set of policies and guidelines for DES SNAP CAN staff, SNAP CAN providers, and all provider staff who deliver services through SNAP CAN.

B. Program Goals and Objectives

Within the context of Federal regulations, DES/DERS administers the SNAP E&T with the following goals and objectives in mind:

1. Keeping families together by promoting self-sufficiency.
2. Expediting service delivery to promote an early exit from SNAP.
3. Including private sector, community, and faith-based organizations for the coordination and provision of program services.
4. Preventing fraud and abuse within SNAP CAN.

C. Program Contacts & Resources

1. For questions regarding policy and/or procedure, send an email and include both derswfpolicy@azdes.gov and snapcan@azdes.gov.
2. For Participant Activity Spreadsheet (PAS) submission, invoicing, payment status, participant eligibility, and budget updates email easnaetreports@azdes.gov.

Chapter 2: SNAP CAN Administration

I. Policy Statement

This policy outlines internal DES referrals, referrals from DES to SNAP CAN, requirements for activities and participation, and virtual services for SNAP CAN.

II. Applicability

Unless otherwise noted, this policy applies to all contracted SNAP CAN provider staff and SNAP CAN State staff.

III. Authority

[Food and Nutrition Act 2008](#).

[7 CFR § 273.7](#) Work Provisions.

[7 CFR § 273.24](#) Time limit for able-bodied adults.

IV. Acronyms and Definitions

Reference the [Glossary](#) for for an explanation of the acronyms used in this Chapter, and definitions of **Able-bodied Adults Without Dependents**, **Activity**, **Family Assistance Administration**, **Tableau Referral File** and **Work Registrant**.

V. Standards

A. FAA Screening for SNAP Benefits

1. The DES Family Assistance Administration (FAA) within the Division of Benefits and Medical Eligibility (DBME), according to their policy and procedures, determines eligibility for Nutrition Assistance (NA) SNAP benefits and screens all NA applicants for the SNAP work requirements. All individuals applying for SNAP benefits will be screened by the FAA (i.e., individuals will be asked to respond to two State-level criteria questions) to determine if it is appropriate to refer them to SNAP CAN.
2. If appropriate, the FAA will notify NA recipients of available SNAP CAN services to meet the employment and training needs of the recipient and will refer the recipient to the [DES SNAP CAN webpage](#), which

includes a list of available SNAP CAN providers. The FAA will then add the NA recipient to the Tableau Referral File.

3. DES uses the reverse referral process for participants to seek services and connect to SNAP CAN.

B. Reverse Referral

1. When an individual has applied for SNAP benefits, an FAA Eligibility Worker (EW) must assess whether the client has a federal work requirement exemption, and must screen the individual (i.e., individuals will be asked to respond to two State-level criteria questions) to determine if a referral to SNAP CAN is appropriate.
 - a. If an individual answers “No” to either State-level criteria question, the participant will not be referred to SNAP CAN and will instead be provided ARIZONA@WORK contact information.
 - b. If an individual answers “Yes” to both State-level criteria questions, the individual will be referred to SNAP CAN.
2. During the interview, the EW will verbally inform the referred individual of the various components that SNAP CAN can assist with, provide information on available participant reimbursements, and explain how to contact a SNAP CAN provider. Following approval, a consolidated work notice will be automatically sent, via the eligibility system, to households that include a referred work registrant.
3. The individual must then, if they choose to do so, directly contact a SNAP CAN provider and ask to be enrolled in the program. If the client has not already been determined eligible for SNAP benefits, this may instead be the first step.
4. The SNAP CAN provider will complete a preliminary assessment to determine if the individual is appropriate for the provider’s program component(s), and if there is an available spot.
 - a. If, after preliminary assessment, it is determined that the provider’s program component(s) is not appropriate for the individual, or that there is no available spot, the individual will be directed to seek another SNAP CAN provider.
 - b. If, after preliminary assessment, it is determined that the provider’s program component(s) is appropriate for the individual, and there is an available spot, the provider

must utilize the Tableau Referral Report to determine eligibility.

5. The SNAP CAN provider must utilize the Tableau Referral Report to determine if the individual has been referred to E&T by an EW and is eligible for services utilizing SNAP CAN funding. The SNAP CAN provider is not reimbursed for services rendered to individuals who have not been referred to E&T by the FAA.
6. The individual's inclusion on the Tableau Referral report will confirm if they are receiving SNAP benefits and are referred to E&T.
 - a. When the provider has confirmed the individual's inclusion on the Tableau Referral report and that the individual has been referred, the provider will enroll the individual into SNAP CAN.
 - b. When the individual is not included on the Tableau Referral report, this indicates that the individual is not receiving SNAP benefits. The provider must provide the individual with information on how to apply for SNAP benefits.
 - c. If the individual is receiving SNAP benefits, but is not referred to E&T, the provider must provide the individual with information on FAA screening to be referred to SNAP CAN. Once the individual has contacted the FAA, and if the FAA refers the individual to E&T, the individual should revisit the SNAP CAN provider to enroll in the program.
7. The SNAP CAN provider must officially enroll the SNAP E&T participant into SNAP CAN.
 - a. SNAP recipients who agree to participate in SNAP CAN must sign a SNA-1066A *Voluntary Participation Agreement*, located on the [SNAP CAN Provider Resources website](#). The provider must retain this document in the participant's case files, following retention schedule requirements as discussed in Chapter 5, Section V(A) of this policy.
 - b. The SNAP CAN provider is not reimbursed for services rendered to individuals who do not knowingly acknowledge and agree to participate in SNAP CAN.
8. When a SNAP recipient, including an Able-Bodied Adult Without Dependents (ABAWD), as discussed in Chapter 3, Section V(C)(1) of this policy, contacts a SNAP CAN provider for assistance, and the

provider has verified the recipient's SNAP benefits, the FAA has referred the recipient to E&T, the Voluntary Participation Agreement has been signed, and a complete Employment and Career Development Plan (ECDP), as discussed in Chapter 3, Section V(A)(2) of this policy, is on file, the provider may then request reimbursement for allowable services rendered.

9. When a SNAP recipient chooses not to participate in SNAP CAN, the provider may not enroll them in SNAP CAN and should instead continue providing services according to the provider organization's policies and procedures.
10. Participation in SNAP CAN is not a requirement to receive SNAP benefits; therefore, benefits will not be negatively impacted for a NA recipient who chooses not to participate in SNAP CAN.

C. SNAP CAN Participation

1. SNAP CAN is a voluntary program. Individuals, including ABAWDS, may participate in SNAP CAN when they agree to participate, have been referred by an FAA EW, and have applied for or are eligible to receive SNAP benefits, during the month(s) E&T services were provided.
2. When a participant fails to comply with an assigned activity, the SNAP CAN provider may reassess the participant's circumstances and assign a new activity or discontinue services using the Provider Determination form (see Chapter 3, V(D)). It is at the discretion of the provider to determine if a participant is not meeting the requirements of an assigned activity. When the participant no longer participates in the component, it is documented on the PAS report. Participants are not subject to any penalties when they cease SNAP CAN participation.

D. Allowable SNAP CAN Activities

1. DES develops activities for SNAP CAN which assist SNAP recipients with gaining the skills and training necessary to increase their ability to obtain regular employment or move up in the workforce and to ultimately achieve self-sufficiency. Activities are outlined within the annual [Supplemental Nutrition Assistance Program Employment and Training \(SNAP E&T\) State Plan](#) and must be approved by FNS.
2. The SNAP CAN provider must explore allowable activities with the SNAP recipient to ensure that the most suitable activity or combination

of activities are assigned. Please refer to the [Glossary](#) within this Policy Manual to review program activity definitions accordingly.

E. Virtual SNAP CAN Services

1. Virtual services are available to all SNAP CAN participants. These services include, but are not limited to, video conference orientations, one-on-one video calls, and/or telephonic services.
2. Support services are available to SNAP CAN participants who do not have access to technology for virtual services. Services include reimbursement for a tablet or laptop, and internet or data services under [non-transportation-related expenses](#).

F. Signatures for SNAP CAN Participant Forms

Electronic signatures, which include telephonic (must be on a recorded line), email, or text agreements, are acceptable forms of signature for all SNAP CAN participant forms. The following are the guidelines that SNAP CAN providers must follow to accept participant forms with an electronic signature:

1. Must be able to verify that the signature was submitted by the participant (i.e. verifying the communication came from the current source on record); and
2. Save the communication and all included documents as one file within the participant's electronic case file.

Chapter 3: Intake, Case Management, and ABAWD Policy

I. Policy Statement

This policy outlines the requirements for conducting a participant's intake, assessment for employability, required case management services, and ABAWD policy.

II. Applicability

Unless otherwise noted, this policy applies to all contracted SNAP CAN provider staff and SNAP CAN State staff.

III. Authority

[Food and Nutrition Act 2008](#).

[7 CFR § 273.7](#) Work Provisions.

[7 CFR § 273.24](#) Time limit for able-bodied adults.

IV. Acronyms and Definitions

Reference the [Glossary](#) for an explanation of the acronyms used in this Chapter, and for definitions of **Case Management, Employability Assessment, Employment and Career Development Plan, Good Cause, Job Retention Services, Job Search Training, and Supervised Job Search.**

V. Standards

A. Enrollment

1. Intake and Assessment

The SNAP CAN provider must complete an employability assessment with each SNAP recipient to identify skills, goals, and employment barriers to inform which allowable activity should be assigned at intake. The purpose of this assessment is to determine an individual's readiness for employment. The provider must maintain copies of all intake documentation provided (hard copy or electronic) and

completed by the SNAP recipient. At a minimum, the intake must include:

- a. An explanation that participation in the program is voluntary;
- b. Signed documentation that indicates that the SNAP recipient acknowledges and understands their participation in SNAP CAN is voluntary and their lack of participation will not negatively impact their SNAP benefits;
- c. An explanation of SNAP CAN activities offered;
- d. An explanation of support services available; and
- e. An employability assessment with the SNAP recipient. The SNAP CAN provider must assess the participant for:
 - i. Career and education history;
 - ii. Goals;
 - iii. Skills (e.g. general skills necessary for the labor market, soft skills and other skills applicable in a variety of settings, interpersonal communication skills, critical thinking, etc.);
 - iv. Abilities and interests;
 - v. Family obligations;
 - vi. Other job-related assets; and
 - vii. Barriers to participation and employment.

2. Employment and Career Development Plan

- a. The SNAP CAN provider must create an Employment and Career Development Plan (ECDP) with each SNAP recipient, following the employability assessment. The ECDP is an agreement between the participant and the provider regarding the actions and responsibilities of both parties.
- b. The ECDP is used to record employment goals, activities, support services, and the agreement through the signatures of the SNAP CAN provider and the participant. The ECDP includes incremental steps to assist participants in overcoming all identified career barriers and support participant strengths and

goals. The SNAP CAN provider must update and revise the ECDP as participants' circumstances change and milestones are met.

- c. The SNAP CAN provider may use the DES [Employment and Career Development Plan \(SNA-1005\)](#) form, or a form established by the provider that must include the following:
 - i. Participant's name;
 - ii. Date the ECDP was developed;
 - iii. Employment goals;
 - iv. Beginning and proposed ending dates of all activities;
 - v. Hours scheduled per week for each activity;
 - vi. Support services as needed;
 - vii. Referred to outside services as needed (N/A must be checked if not referred);
 - viii. Participant's and SNAP CAN provider's signature; and
 - ix. Assigned activities.

B. Case Management Services

All participants must receive case management services as part of SNAP CAN services. Case management services must be targeted to the individual participant and designed to support the participant as they progress through the program services.

1. Case management services include a comprehensive intake assessment, individualized service plan, progress monitoring, coordination with service providers, support services Chapter 4 (E) and at least one allowable program component activity, Chapter 4 (V)(B) [Component Activities](#), assigned to the participant.
2. Case management services must support the participant's activities and not be an impediment to participation in SNAP CAN. The provider should do their best to accommodate potential needs and access issues for participant appointments, including virtual and phone appointments. The provider has the flexibility to adjust the timing and frequency of appointments to meet the needs of the participant. Appointments must be conducted at least monthly.

3. Case management services may also include activities and support services outside of SNAP CAN. A list of community resources and services may be found by visiting the [2-1-1 Arizona](#) website. Services must:
 - a. Directly support an individual's participation in SNAP CAN; and
 - b. Use SNAP E&T Program funds only for allowable components, activities, and support services.
4. Participation hour requirements for case management:
 - a. Hours spent participating in case management services must be tracked by the SNAP CAN provider. The provider has flexibility in the method they use to track a participant's participation hours (e.g. database tracking or tracking sheet).
 - b. For ABAWD participants, the time a participant spends in case management must count towards their program participation hours.
 - c. Hours spent participating in barrier removal activities do not count towards participation hours, unless the activity is an allowable SNAP CAN component activity. Barrier removal activities may include, but are not limited to:
 - i. Substance use disorder services;
 - ii. Parenting classes;
 - iii. Driving courses for a license, or for violations.

C. ABAWD Informational Policy

1. An ABAWD is identified as an individual who is between the ages of:
 - i. 18 and 49 (through 08/30/2023);
 - ii. 18 and 51 (beginning 09/01/2023);
 - iii. 18 and 53 (beginning 10/01/2023);
 - iv. 18 and 55 (beginning 10/01/2024 and ending on October 1, 2030);
- b. Physically and mentally capable of working;

- c. Not responsible for a dependent child or residing in a household where a household member is under age 18; and
 - d. Not pregnant.
2. Overview - Unless an FNS-approved area-specific or statewide waiver is in effect, the following ABAWD requirements apply:
- a. An ABAWD is limited to receiving SNAP benefits for three full months within a 36 month period, unless they are meeting the ABAWD Work Requirement according to FAA policy. If the ABAWD does not meet the ABAWD Work Requirement within a 30 calendar day period, this is considered a “countable month”, countable months are reviewed, determined, and tracked through FAA policy. If an ABAWD receives three countable months, their benefits may be impacted.
 - b. To remain eligible for SNAP benefits, ABAWDS have multiple avenues of meeting the ABAWD work requirements as defined in FAA Policy. ABAWD participants may participate in SNAP CAN services to meet the ABAWD work requirements, by participating in an allowable SNAP CAN component for at least 80 hours per month.
 - c. Allowable component activities may include supervised job search, job search training, education and/or training, and job retention services. Case management participation hours are included in the 80 participation hour requirement.
 - d. When an ABAWD stops participating, is not meeting the ABAWD participation requirements, and they do not meet good cause for nonparticipation, the participant will receive a countable month. The SNAP CAN provider must notify DES SNAP CAN State staff of the participant's noncompliance with program requirements. State staff must notify the FAA of the participant's noncompliance with the program requirements. FAA staff determines good cause and noncompliance of participation.
 - e. When an ABAWD receives three countable months of SNAP benefits without meeting the ABAWD work requirement, the result will be the loss of some or all of the household's SNAP benefits for the remainder of the 36-month period. An ABAWD may regain SNAP eligibility during this time period by reapplying for SNAP and meeting the ABAWD work requirements, after

which, the ABAWD remains eligible to receive SNAP for as long as they continue to meet the ABAWD work requirement.

- f. ABAWDs are SNAP recipients who have not exhausted the ABAWD time limit or applicants trying to regain SNAP eligibility because they have already received three countable months of SNAP benefits.
 - g. There is no limit on how many times an ABAWD may regain eligibility and subsequently maintain eligibility by meeting the ABAWD work requirement.
 - h. DES may temporarily waive the ABAWD Work Requirements for part of, or for the entire State of Arizona. When the timelimit is waived, ABAWDs are not subject to the three month benefit time limit. The provider must confirm the current ABAWD time limit waiver status with SNAP CAN State Staff. ABAWD participation must still be verified and tracked by the providers and DES.
3. ABAWD Special Requirements for Supervised Job Search
- a. Supervised job search and job search training must comprise less than half of the time spent in allowable SNAP CAN activities.
 - b. An additional component must be assigned. For example, an ABAWD may be assigned to job search training for nine hours a week and to education and/or training for 11 hours a week, totaling 20 hours.

For additional information regarding ABAWD policies and requirements, please see the [Able-Bodied Adult Without Dependents \(ABAWD\) webpage](#).

D. Provider Determination

The provider may determine, at any point during a SNAP CAN participant's time participating in their program, that the participant may not be a good fit for their organization or for an assigned component. The provider has the authority to choose a more suitable component or to make a provider determination and notify DES of the determination. When a SNAP CAN provider determines that the SNAP CAN participant is "ill-suited" for the component they can:

1. Enroll the participant in another component in the provider's SNAP CAN program and inform SNAP CAN state staff on the monthly PAS report. No Provider Determination form is needed; or
2. When a SNAP CAN provider does not have an appropriate component, they will initiate the Provider Determination process:
 - a. The SNAP CAN provider will complete the [Provider Determination form](#).
 - b. The SNAP CAN provider will initiate the Provider Determination process within 10 calendar days of the date the determination is made, by sending an email to both FAARAMGT@azdes.gov and easnaetreports@azdes.gov. The emails will include the following:
 - i. Subject: Provider Determination
 - ii. An attached Provider Determination form with both the decision and the recommended next steps based on the assessment.
3. The state agency will take all of the following actions upon receipt of the Provider Determination form:
 - a. DBME Research & Analysis Unit staff will document the case file with the Provider Determination request and instructions to reassess the work registration at recertification and upload the Provider Determination form to the case file.
 - b. State SNAP CAN staff will send the participant a general information notice, within 10 calendar days of receipt of the Provider Determination form, that includes all of the following information:
 - i. What a provider determination is;
 - ii. Next steps the State agency will take as a result of the Provider Determination;
 - iii. That the participant is not being sanctioned;
 - iv. Contact information for the State agency, including directions for the client to call HEAplus Customer Service (1-855-432-7587) if the client would like the Provider Determination to be completed earlier than their next renewal; and
 - v. When the participant is an ABAWD, the notice will inform the participant that they will accrue countable months

towards their three-month participation time limit the next full benefit month after the provider determination. Months will not accrue for the participant's three-month participation time limit when any of the following applies to the participant:

1. Has a good cause reason;
 2. Lives in a waived area; or
 3. Is otherwise exempt.
4. DBME eligibility staff will select the most suitable option among the options below during recertification or upon request from the participant:
- a. Reassess the physical and mental fitness of the individual.
 - b. Coordinate with other Federal, State, or local workforce or assistance programs to identify work opportunities or assistance for the individual.
5. DBME eligibility staff will code the AZTECS system with the appropriate referral or non-referral code for each participant as a result of the reassessment.
6. DBME Research & Analysis Unit staff will document the provider determination in the participant's case file. SNAP CAN state staff have access to this information.

ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Program: Supplemental Nutrition Assistance Program Career Advancement Network

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Chapter 4: Activity Components, Activity Verification, and Support Services

I. Policy Statement

This policy outlines the requirements for allowable component activities in SNAP CAN, how a SNAP CAN provider verifies activities, and case file maintenance. Included is a section for allowable participant reimbursements and requirements for reimbursement.

II. Applicability

Unless otherwise noted, this policy applies to all contracted SNAP CAN Provider staff and SNAP CAN State staff.

III. Authority

[7 CFR § 273.7](#) Work Provisions.

IV. Acronyms and Definitions

Reference the for an explanation of the acronyms used in this Chapter, and [Glossary](#) for definitions of **Federal Fiscal Year**, **Transportation Related Expenses**, **QAIA**, and **Non-transportation related expenses**.

V. Standards

A. **Activity Components**

The SNAP CAN provider must use the employability assessment to develop the participant's ECDP and assign them to an appropriate activity or combination of activities. Each assigned component must entail a certain level of effort by the participant.

B. **Allowable SNAP CAN Component Activities**

1. Supervised Job Search

a. Supervised job search is a structured component in which participants are required to actively seek employment with the support of case management and monthly scheduled check-ins with their case manager.

b. Supervised job search must be provided, virtually or in person,

by skilled staff, who are knowledgeable in workforce services to provide meaningful guidance and support for a participant's successful job search, in obtaining employment or securing better employment.

- c. Services may include job search coaching, a review of job search activities, and guidance on how to best target participant job search activities.
- d. Participants must track their job search activities on an activity tracking form provided by the SNAP CAN provider. The provider has the flexibility of choosing the method for tracking participant activities. The tracking method chosen is based on provider resources and participant needs.
- e. To meet the needs of participants, case management appointments may be conducted virtually or in person. During case management appointments, participants and the SNAP CAN provider review documented activities to ensure the participant's job search aligns with their skills, education, and experience.
- f. The Supervised job search component is limited to 12 weeks in a 12-month period. The 12 weeks do not have to be consecutive. When determining the 12-week limit, one week equals 20 hours. This equates to 240 hours per 12-month period. Once the limit has been reached, program staff must assign the participant to another allowable program component.
- g. Supervised job search, as a single component, is not a qualifying activity related to the participation requirements necessary to fulfill the ABAWD work requirement. Supervised job search is an acceptable activity when it is offered as part of other E&T components and comprises less than half of the total required component participation hours.

2. Job Search Training

- a. The purpose of job search training is to improve a participant's skills in both searching and applying for jobs. Participants assigned to this activity are instructed to attend workshops on career exploration and planning, work ethics, personal appearance, resume preparation, job search techniques, and other work-related activities.

- b. Job search training is limited to 12 weeks in a 12-month period. The 12 weeks do not have to be consecutive. When determining the 12-week limit, one week equals 20 hours. This equates to 240 hours per 12-month period. Once the limit has been reached, program staff must assign the participant to another allowable program component.
 - c. For ABAWD participants, job search training is only acceptable when combined with another allowable program component and must be less than half of the 20-hour requirement.
3. Education and/or Training
- a. The education and/or training component includes educational activities and programs that improve basic skills and the employability of SNAP CAN participants. Educational and/or training programs may include Adult Basic Education, Basic Literacy, English as a Second Language (ESL), High School Equivalency, Career and Technical Education, Vocational Training, and other post-secondary education.
 - b. An education and/or training program must provide an opportunity for a participant to earn postsecondary credentials in in-demand industries, which includes certificates and degrees, industry-recognized credentials, and licensures.
 - c. Educational and/or training programs or activities assigned must improve the basic skills or employability of the participant, including educational programs to expand the job search abilities. This may include work readiness activities, such as general skills building, developing good work habits, and building a work history. Only educational and/or training components that directly enhance the employability of the participants are allowable. A direct link between education and work readiness must be established for a component to be approved. Participants should spend at least 12 hours per month participating in an education and/or training program.
 - d. See [Glossary](#), *education and/or training* for allowable educational programs or activities. Available education and/or training activities include:
 - i. Job readiness activity;
 - ii. Remedial education; and

- iii. Vocational training.
 - e. Documentation must be entered by the SNAP CAN provider into the participant's case record identifying what skills the participant currently possesses and how the education and/or training will improve the participant's employability.
 - f. The duration spent in the education and/or training component may not exceed 24 months. The participant must remain in good standing as defined by the education and/or training institution.
 - g. SNAP CAN providers may use 50/50 or 100 percent funding to pay for costs of administering the program and support for students. 50/50 funds can only be used for participant reimbursement books, supplies, and additional [support services](#).
 - h. Federal reimbursement funds provided to operate an educational component must not be used to replace non-federal funds, already being used to pay for a participant's educational services and activities. (e.g. A student who is attending an educational institution and whose education costs are already being paid for, may participate in another SNAP CAN component. It would not be appropriate to use Federal funds to subsidize the previously covered expenses).
 - i. Federal funds may be used to operate approved educational component activities; however, SNAP E&T funds may not be charged more than what the general public would pay for the same service.

4. Job Retention Services

Participants who have secured unsubsidized employment through direct participation in SNAP CAN and are assigned to the job retention services component are eligible to receive support services to assist in retaining employment. These services include case management, job coaching, dependent care, and transportation aid.

- a. Individuals must be employed, on average, 30 hours per week, and be receiving a wage of at least Federal or State Minimum wage, whichever is higher, to be eligible for job retention services.
- b. Job retention services must be provided for a minimum of 30 calendar days and not more than 90 calendar days. Good faith effort must be made to provide at least 30 calendar days of job

retention services, and the action taken must be documented by the SNAP CAN provider in the participant's case file. Good faith effort may include:

- i. Reasonable efforts to contact the participant;
 - ii. A discussion of the requirements at the outset of the enrollment in this component; or
 - iii. An outline of the steps that the participant will take entered into their ECDP.
- c. Job retention services are available to participants who are receiving SNAP benefits in the month of, or the month before the beginning of the 90 calendar days.
- d. Allowable support services within the job retention services component may include the following:
- i. Clothing;
 - ii. Equipment or tools required for a job;
 - iii. Test fees;
 - iv. Union dues;
 - v. Licensing and bonding fees; and
 - vi. Transportation.
- e. When a participant loses employment while assigned to the job retention services component, they are no longer eligible to receive support services listed within the job retention services component.
- f. The SNAP CAN provider must obtain evidence of participation hours for all components and unsubsidized employment monthly.
- g. When a participant reaches 90 calendar days of participation in the Job retention services component, the component and case must be closed.

C. Participant Component Activity Verification

For SNAP CAN participants, the SNAP CAN provider must provide case management services at least once monthly to monitor and verify component

participation, and to collect documentation used as evidence of participation. Documentation must be signed and dated by the participant and provider attesting to the truthfulness of the information provided. For participant activity tracking, the following types of verification can be used:

1. Supervised Job Search

Participant tracking documentation must include the hours spent in the component and actions taken by the participant. This includes, but is not limited to, identifying and/or applying for employment opportunities.

2. Job Search Training

Participant tracking documentation must include the hours spent in the component and the activities that helped the participant prepare to obtain and maintain employment. This includes, but is not limited to, career exploration and planning, work ethics, personal appearance, resume preparation, and job search techniques.

3. Education and/or Training

Participant tracking documentation must include the hours spent in the component and the activities that helped the participant improve basic skills for employability. This includes, but is not limited to, adult basic education (ABE), basic literacy, English as a second language (ESL), high school equivalency (GED), and post-secondary education.

4. Job Retention Services

Participant tracking documentation must include the hours spent in the component in the form of a paystub, employment offer letter, or an employer-written statement. When no other documentation is available, a participant's written statement is satisfactory to justify expenditures associated with job retention services. Participation hours for this activity are equivalent to the number of verified employment hours.

D. Case File Maintenance

1. The SNAP CAN provider must monitor and document participant progress in activities at least once a month. Required documentation includes the following:

- a. Participation progress;
- b. Changes in the ECDP;
- c. Changes in activities and/or schooling;

- d. For any participant support service reimbursement issued, include a brief description and expense amount; and
- e. Supervised job search/application logs or other logs for any participant who receives support services. Logs must include all activities the participant completed within their job search, including all jobs the participant applied for, and any other activities that contributed to reaching the goals established in their ECDP.

2. Documenting Participant Progress

Participant case files must contain information about participant progress including the activity in which the participant is engaged, the dates of participation in that activity, and regular program progress notes. DES evaluates information based on the following guidelines and expectations:

- a. Initial Progress Notes: In the initial month of participation, the progress note must document the employment goal and SNAP CAN activities that help the client obtain this goal.
- b. Ongoing Progress Notes: Ongoing progress notes must detail the participant's monthly activities and address the following elements, when applicable:
 - i. The participant's progress in SNAP CAN activities;
 - ii. How the participant's progress was assessed;
 - iii. Any changes in the participant's personal employment and/or education plan;
 - iv. Reason for delays in progress; and
 - v. A loss of contact with the participant, and an inability to assess progress when unable to contact the participant.
- c. Closing Progress Note: When participation in SNAP CAN ends, for any reason, the SNAP CAN provider must enter a final closing progress note documenting the outcome and explaining why the participant ceased participation in SNAP CAN (e.g. the attainment of a degree, certificate, or securing employment).

3. Participant Case Files

The SNAP CAN provider must keep comprehensive case files for all SNAP CAN participants. Case files may be in hard copy or electronic formats, or a combination of both. DES will review case files as part of quarterly Quality Assurance and Integrity Administration (QAIA) monitoring and annual fiscal monitoring. The provider may organize participant files according to their organizational standards, and at a minimum, files must contain the following information:

- a. Intake assessment;
- b. Participation Acknowledgement;
- c. ECDP;
- d. Case management updates; and
- e. Support services issued.

E. Support Services

1. All reasonably necessary expenses, directly related to participation, which are incurred by individuals participating in an approved SNAP CAN service or component, must be paid for or reimbursed by SNAP E&T funds. An expense is reasonable if it does not exceed what a prudent person would pay.
2. Support Service reimbursements are for allowable expenses and directly related to participation in program services, are only allowable to provide goods and services directly to a participant, and must relate to the participant's ECDP. The SNAP CAN provider provides support services to participants based on individual needs and program resources.
3. The SNAP CAN Provider may not use SNAP E&T Program funding to pay for support services when participants receive other funds identified to cover those costs. For example, other sources of funding include, but are not limited to:
 - a. Federal Financial Aid;
 - b. Grants;
 - c. Scholarships; and
 - d. Private sources.

F. Support Services Categories and Amounts

1. Transportation-Related Expenses

a. Transportation-related expenses assist participants with transportation expenses incurred due to participation in allowable SNAP CAN activities. Transportation-related expenses are limited to \$100.00 per participant, per month. Examples include:

- i. Public transportation fare;
- ii. Gasoline; and
- iii. Uber/Lyft.

b. The following Transportation expense examples are limited to \$1,000.00 per participant, per year.

- i. Vehicle or bike repairs
- ii. Bike purchases

2. Non-Transportation Related Expenses

a. Participants are provided with non-transportation related expenses to participate in SNAP CAN activities and/or to accept and maintain employment.

b. The following non-transportation expense examples are limited to \$3,500.00 per participant, per year:

- i. Test fees
- ii. Course fees
- iii. Books
- iv. Training materials
- v. Supplies
- vi. Fingerprinting
- vii. Background checks
- viii. Driver's license
- ix. Registration fees

- x. Legal assistance
- c. The following non-transportation expense examples are limited to \$1,000.00 per participant, per year:
 - i. Clothing
 - ii. Personal hygiene
 - iii. Uniforms
 - iv. Grooming
 - v. Medical
 - vi. Dental
 - vii. Vision
- d. The following non-transportation expense examples are limited to \$300.00 per participant, per month:
 - i. Utility Assistance
 - ii. Housing Assistance
- e. The following non-transportation expense examples are limited to \$800.00 per participant, per year:
 - i. Cell phone purchase
 - ii. Laptop purchase

3. Childcare

- a. SNAP CAN providers that provide dependent care services are authorized to be reimbursed for dependent care services rendered to SNAP CAN participants. This applies solely to participants who need dependent care to participate in SNAP CAN activities.
- b. Childcare expenses are limited to \$300.00 per participant, per month.
- c. Reimbursement will not be authorized for dependents age 13 or older, unless they are physically and/or mentally incapable of caring for themselves or are under court supervision.

G. Tracking Support Services

SNAP CAN Providers must track all support services provided using the PAS. Participant case files must include a justification for each issuance and the following:

1. Copies of ticket and bus pass issuance, or logs; and
2. Copies of receipts for all support services issued.

ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Program: Supplemental Nutrition Assistance Program Career Advancement Network

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Chapter 5: Monitoring and Auditing

I. Policy Statement

This policy provides the regulatory requirements that SNAP CAN providers must adhere to for case record retention, auditing, quality assurance reviews, program funding, and fiscal requirements.

II. Applicability

Unless otherwise noted, this policy applies to all contracted SNAP CAN Provider staff and SNAP CAN State staff.

III. Authority

[2 CFR Part 200](#) – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

[7 CFR § 273.7](#) Work Provisions.

[31 U.S.C. 7501](#) et seq. Single Audit Act

IV. Acronyms and Definitions

Reference the [Glossary](#) for an explanation of the acronyms used in this Chapter.

V. Standards

A. **Case Record Retention**

Case files, hard copy or electronic, must be available for DES or FNS review, at any reasonable time, for quality assurance and auditing purposes.

Following are the record retention requirements for SNAP CAN participant case files:

1. SNAP CAN providers must retain closed case files in their local office(s) for at least six months after case closure and ensure that case files are stored in an accessible location.
2. After six months, closed case files may be moved and/or stored in an alternate, secured location, and must be retained for three years.

B. SNAP CAN Provider Program Monitoring

SNAP CAN provider monitoring and evaluation will be coordinated quarterly with the DERS QAIA team, and annually with the DERS fiscal compliance team- the Finance and Business Operations Administration (FBOA)- to ensure program integrity. DES will provide written notice to the provider, which will contain further instructions for the provider and list evaluation criteria.

1. QAIA

The QAIA monitors SNAP CAN through continuous evaluation and monitoring activities. The QAIA conducts case file reviews using a random sampling methodology and reviews cases for evidence that demonstrates adherence to program policies.

2. FBOA

- a. The FBOA will conduct an annual on-site fiscal review. All SNAP CAN providers are subject to programmatic and fiscal monitoring requirements to ensure accountability of the delivery of all goods and services, as required under [31 U.S.C. 7501](#).
- b. FBOA will review supporting documentation for selected invoices and expenditures to ensure that they are allowable and allocable per the Cost Principles at [2 CFR Part 200](#). The DERS FBOA will provide written notice and further instruction to the SNAP CAN provider 45 calendar days prior to the evaluation date.
- c. All SNAP CAN providers are subject to auditing by the FNS to ensure all appropriate laws, rules, and procedures are being followed. This may involve the auditing of client case files, whether electronically or on-site, and surveying of the provider and/or participants.

3. FNS

All SNAP CAN providers are subject to auditing by FNS to ensure all appropriate laws, rules, and procedures are being followed. This may involve the auditing of client case files, whether electronically or on-site, and surveying the provider and/or participants.

4. Budgets

- a. The SNAP CAN provider must submit all budgets on DES-approved budget forms with specific line items and calculations. Funds may not be moved from administrative to participant

reimbursement/support services or vice versa without prior approval from DES.

- b. DES will notify the SNAP CAN provider at least 15 calendar days before the budget is due. Budgets and allocations are only approved after FNS certifies the annual SNAP E&T Program State Plan.
- c. An increase to the total budget requires a contract amendment. The SNAP CAN provider must submit all budget or contract change requests as soon as possible to EASNAETreports@azdes.gov. The DES program and fiscal units will review all changes for final approval.
- d. The SNAP CAN provider is responsible for monitoring the reimbursement of expenditures against the most recently approved Itemized Service Budget (ISB) to ensure that invoices submitted for payment do not exceed the budget levels approved by DES. DES is under no obligation to pay invoices that exceed the most recently approved ISB or contract amendment. Contract amendments should be executed prior to the costs being incurred or submitted for reimbursement.

4. Factors Affecting Allowability of Cost

- a. Costs must meet general criteria requirements to be allowable under the federal grant award. The general criteria defines that costs must be necessary, reasonable, and directly related to program services.
- b. The purpose of SNAP CAN services are to assist SNAP recipients in gaining skills, training, and ultimately sustainable employment. The following considerations should be made when deciding if costs are reasonable, necessary, and directly related to program services:
 - i. Reasonable: If in nature and amount, the cost does not exceed what a prudent person would pay under circumstances prevailing at the time the decision is made to incur the cost.
 - ii. Necessary: Costs are incurred to carry out essential functions, cannot be avoided without adversely affecting program operation, and do not duplicate existing efforts.

- iii. Allowable costs must be directly related to an approved SNAP E&T component.
- c. Emergency shelter/housing/space costs and the administrative costs associated with operation are unallowable (i.e. staff salaries and wages, staff benefits, maintenance, laundry and cleaning services, room furnishings, and utilities etc).
- d. Costs must not be used to meet any cost-sharing or matching requirements of any other federally-financed program, in either the current or prior period.
- e. Only those costs included and approved in the ISB are eligible for reimbursement.

5. Funding

- a. DES uses a third-party reimbursement model to fund SNAP CAN. Within this model, FNS reimburses states 50 percent of the cost to support individuals participating in allowable SNAP CAN activities. Reimbursement is only provided if allowable activities are initially paid for with non-federal funds.
- b. 100% Federal funds are not allowable for participant reimbursements, these funds are for administrative purposes only. 50/50 funds are allowable for participant reimbursement.

6. Reutilization of SNAP E&T Program Funds

The SNAP CAN provider may use the funds received from reimbursement of SNAP CAN expenditures as a “local” match for future invoices. This is known as reutilizing SNAP E&T Program Funds. The provider must receive the funds, expend the funds on valid program costs, and invoice the funds through the DES-approved invoicing process to reutilize the funds.

7. PAS Report

The PAS report is a DES-approved document used by the SNAP CAN provider to record information for SNAP CAN participants served during each calendar month.

- a. PAS report information includes, but is not limited to, the date of service, assigned activities, and issued support services. For SNAP CAN providers to receive reimbursement, one completed PAS report must be submitted to EASNAETreports@azdes.gov by 5:00 PM on the 10th day of the month.

- b. If PAS reports are not turned in on the 10th day of the month, providers are considered out of compliance, and an out of compliance notice will be sent at the end of the month. The provider will be notified 45 calendar days after the due date (10th day of the month) to cease their SNAP CAN program and that they are ineligible for reimbursements until they are in compliance and a notice is sent to the provider to restart the program.
- c. SNAP CAN providers are responsible for the accuracy of their PAS report. In order for the provider's PAS report to be reviewed for accuracy by SNAP CAN staff, the report must be submitted to EASNAETreports@azdes.gov before the 10th calendar day of the month. If corrections are needed, a Program staff member will return the report to the provider within one business day. All corrections should be made by providers and resubmitted to EASNAETreports@azdes.gov no later than 5:00 PM on the 10th calendar day of the month. PAS Reports turned in on time will be processed within five business days of the receipt.
- d. If the PAS Report is received on the 10th calendar day of the month, or later, it will be accepted as is and will not be reviewed for accuracy. The SNAP CAN provider may not be eligible for reimbursement if requirements are not met.
- e. Late PAS reports or requested edits on reports submitted need approval for reimbursement. If the reimbursement is approved, DES will send an acknowledgment email to the SNAP CAN provider and process the report within seven business days of receipt. The SNAP CAN provider is provided with the SNAP billable hours, which contains updated numbers of eligible participants after the PAS and eligibility data match is reviewed and completed by DES.

8. SNAP CAN Provider Invoice

- a. The SNAP CAN provider Invoice is a monthly report completed by the provider that itemizes expenditures related to allowable services and activities provided to SNAP CAN participants.
- b. The SNAP CAN provider must submit the SNAP CAN provider Invoice, attaching the SNAP billable hours, to EASNAETreports@azdes.gov no later than 10 calendar days after receiving confirmation of eligible SNAP CAN participants. DES State Staff will send an acknowledgment email and process

the SNAP CAN provider Invoice within 7-10 business days of receipt.

- c. If a SNAP CAN provider Invoice is submitted within 10 calendar days after receipt of the billable hours, the provider is considered out of compliance, and an out of compliance notice will be sent to the provider at the end of the month. The provider will be notified 45 calendar days after the due date (10th day of the month) to cease their SNAP CAN program and that they will remain ineligible for reimbursements until the provider is in compliance and receives a notice to restart the program.

9. Cost Allocation

- a. During the annual onsite fiscal review of program costs and expenditures, DES State Staff will request a copy of the SNAP CAN provider's approved cost allocation plan to ensure that costs and expenditures align with the approved plan. DES will review the methodology and justification behind the cost allocation.
- b. DES recommends that the SNAP CAN Provider prepare a cost allocation plan along with their budget every FFY and choose either the:
 - i. Indirect cost rate to cover the common goods; or the
 - ii. Cost allocation plan to cover the common costs.
- c. The SNAP CAN provider may only use one method for SNAP CAN and must allocate all payroll/admin costs (i.e. fringe benefits) using the same allocation method.

10. Duplicated Services and Co-enrollment

- a. SNAP CAN Providers are responsible for collaborating and must ensure that activities and/or services are not duplicated. A list of current SNAP CAN providers is available at the DES [SNAP Recipient](#) website (under the Community Partners section).
- b. Only one SNAP CAN provider will be reimbursed for duplicated services. A duplicated service occurs when separate providers provide the same activity and/or service to a shared participant within the same calendar month. In the instance of a duplication of services between two providers, the provider who receives an approval for their PAS report first, which includes accuracy and meeting the deadline, will be reimbursed for the services

provided. The second provider will not be reimbursed for services.

- c. Duplication of services is not the same as co-enrollment, which occurs when separate SNAP CAN providers share the same participant within the same calendar month, but each provides a different activity and/or service. At times, a participant may need services that the provider does not provide. When this occurs, the provider may refer the participant accordingly.

C. FNS Reporting Requirements

1. FNS requires DES to track specific participant and program activity details quarterly, and additional outcome measures annually. DES uses the information recorded on the PAS and other DES-automated data tools collectively, to meet all data and reporting requirements.
2. The SNAP CAN provider must submit a complete and accurate PAS to EASNAETreports@azdes.gov no later than 10 calendar days after the end of each calendar month to ensure all required data and additional outcome measures are collected and reported timely.
3. DES may require additional follow-up or action from the SNAP CAN provider for specific data and reporting needs. DES will provide the provider with a written notification that outlines necessary instructions when additional action is required.

D. SNAP E&T Activity Report (FNS-583)

1. The SNAP E&T Program Activity Report (FNS-583) is a quarterly report that tracks activity details, ABAWD participation, and SNAP benefit registration information. DES coordinates with the Division of Benefits and Medical Eligibility (DBME) and the SNAP CAN provider respectively, to collect the data for this report.
2. The FNS-583 must be submitted to FNS no later than 45 calendar days after the end of each federal fiscal quarter. Federal fiscal quarters are defined as follows:
 - a. 1st Quarter (October – December)
 - b. 2nd Quarter (January – March)
 - c. 3rd Quarter (April – June)
 - d. 4th Quarter (July – September)

E. Oversight Monitoring, Oversight, and Reporting Measures

1. DES must submit an annual outcome report to FNS on activity measures, employment data, and specific participant characteristics. DES coordinates with the SNAP CAN provider to ensure all required information is reported accordingly.
2. Activity outcome measures must be listed on the annual SNAP E&T State Plan and approved by FNS. These measures are established by DES and are subject to change as the program advances from one year to the next. The annual SNAP E&T State Plan can be found on the [SNAP CAN Providers](#) website.
3. DES will collect and report the following information required by FNS:
 - a. The number and percentage of SNAP E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in the SNAP E&T.
 - b. The number and percentage of SNAP E&T participants and former participants who are in unsubsidized employment during the fourth quarter after completion of participation in the SNAP E&T.
 - c. Median average quarterly earnings of the E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in the SNAP E&T.
 - d. The total number and percentage of participants that completed an educational program and received a certification or degree.
4. DES must also report on specific participant characteristics, which require data on the number and percentage of the SNAP E&T participants who:
 - a. Are voluntary versus mandatory participants;
 - b. Have received a high school degree (or GED) before being provided with SNAP E&T services;
 - c. Are ABAWDs;
 - d. Speak English as a second language;
 - e. Are male versus female; and

f. Are within each of the following age ranges:

i. 16-17;

ii. 18-35;

iii. 36-49;

iv. 50-59; and

v. 60 or older.

Chapter 6: DES Policies

I. Policy Statement

This section includes general DES-related policies and information not described elsewhere within the SNAP CAN Policy Manual.

II. Applicability

Unless otherwise noted, this policy applies to all contracted SNAP CAN provider staff and SNAP CAN State staff.

III. Authority

[7 CFR § 271.6](#) Complaint procedure.

[7 CFR § 272.6](#) Nondiscrimination Compliance.

[DES 1-01-45](#) Address Confidentiality Program.

IV. Acronyms and Definitions

Reference the [Glossary](#) for an explanation of the acronyms used in this Chapter.

V. Standards

A. Grievance/Issue Resolution

1. SNAP Participant Grievance Guidelines
 - a. Grievance/issue resolution is the process by which disagreements or misunderstandings in SNAP CAN are resolved with program participants, providers, community advocates, and/or others in need of resolution.
 - b. Grievance/issue resolution must begin within one business day of the date the written (hard copy or electronic) or verbal concern is received by the SNAP CAN provider. The provider has the flexibility to design their escalation process and must attempt to resolve grievances through their process.
2. Client Advocacy

If a grievance has not been resolved through the SNAP CAN provider's escalation and grievance process, participants can contact the Workforce Client Advocate to report their concerns. The Workforce Client Advocate may be reached by email at EAClientAdvocate@azdes.gov.

B. Reporting Abuse/Neglect

The SNAP CAN provider must report any known or suspected incidents of abuse, neglect, abandonment, or exploitation of minor children and vulnerable or incapacitated adults to the Child Protective Services Hotline at 1-888-767-2445 or the Adult Protective Services Hotline at 1-877-767-2385.

C. Confidentiality

1. The SNAP CAN provider cannot discuss confidential information unless it directly relates to official duties. Documents containing confidential information must be disposed of using a paper shredder or confidential shred container, and must not be included with general office trash. Documents containing confidential information must not be left on office photocopiers, printers, etc. All case files must be stored in secure areas to prevent theft and the release of information to unauthorized persons.
2. Release of Information to Other Persons and Agencies
 - a. Release of Information With Signed Consent
 - i. Program staff cannot release confidential information without consent from the participant. Exceptions apply as listed below.
 - ii. Permission to release information **MUST** be obtained in writing from the participant when a request is made by any unauthorized source. The DES [Release of Information \(SNA-1006A\)](#) form may be used for this purpose, or the SNAP CAN provider may use an equivalent form, ensuring that the same required information is included.
 - iii. The permission to release information must include the following:
 - a) The information to be released.
 - b) The name of the person or organization that is permitted to receive the information.
 - c) The time period in which the release is valid.

- d) The dated signature of the participant.
- iv. The participant must be informed of a request for information from sources other than those listed in the Release of Information without Signed Consent section.
- b. Release of Information Without Signed Consent

The release of confidential information may be required without a client's consent to facilitate services and comply with state and federal regulations. Confidential information may be disclosed for official purposes without the client's consent. Disclosure is limited to the following:

- i. Employees of DES who have a business need to know;
- ii. The Office of the Arizona State Attorney General;
- iii. Approved providers or contractors, to implement employment/training plans;
- iv. Any entity authorized by federal or state statute, or any entity that has a current signed data-sharing agreement with DES. Data-sharing agreements must designate the secured sharing of confidential client information without the client's consent;
- v. Government officials who are conducting audits in connection with the administration of any assistance program, by a governmental entity that is authorized by law to conduct such audits;
- vi. Social Security Administration employees.

3. Public Releases of Information

- a. The SNAP CAN provider must obtain the participant's permission before using information about the participant for any of the following:
 - i. Speeches or presentations; participants could be motivational speakers to individuals currently participating in the program.
 - ii. Videotapes or photographs.
 - iii. Media news articles or newsletters.

- iv. Local office bulletin boards, displays, or participant success story usage.
- v. Recognition certificates and plaques.
- b. Any other materials identifying the individual (directly or by association) as a program participant.

D. Americans with Disabilities Act (ADA)

SNAP CAN and SNAP CAN providers must ensure equal access to individuals with disabilities by providing reasonable accommodations in all aspects of program administration to assist individuals with disabilities to obtain needed training and/or to engage in employment activities, including the following accommodations:

- 1. Program forms must be available in an alternative format and include the ADA statement;
- 2. Notices about training, conferences, or other program or administration activities must include the ADA statement;
- 3. SNAP CAN provider locations must display both English and Spanish [ADA Notice posters \(POX-248\)](#) that include ADA representative contact information.

E. Civil Rights

SNAP CAN and SNAP CAN provider civil rights policies must be based on USDA Federal Civil Rights requirements.

1. Nondiscrimination

In accordance with federal civil rights law and USDA civil rights regulations and policies, the USDA, its agencies, offices, employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on:

- a. Race;
- b. Color;
- c. Religion;
- d. National origin;
- e. Sex;

- f. Gender Identity, including gender expression;
 - g. Sexual orientation;
 - h. Age;
 - i. Disability;
 - j. Marital status;
 - k. Family/parental status;
 - l. Income derived from a public assistance program;
 - m. Political affiliation; or
 - n. Reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.
2. No person shall be denied services, benefits, privileges or employment as a consequence of having participated in any way in the discrimination complaint process against DES, its providers, or their employees.
 3. Persons with disabilities who require alternative means of communication for program information (e.g., braille, large print, audiotape, American Sign Language) should contact the agency (state or local) where they applied for benefits. Individuals who are deaf, hard of hearing, or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.
 4. To file a program complaint of discrimination, complainants should complete the [USDA Program Discrimination Complaint Form](#) (AD-3027) found online at: [How to File a Complaint](#), and at any USDA office, or should write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Completed forms or letters should be submitted to USDA by:
 - a. Mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
 - b. Fax: (833) 256-1665 or (202) 690-7442

c. Email: program.intake@usda.gov.

F. Arizona Address Confidentiality Program (ACP)

1. The ACP is administered by the Office of the Arizona Secretary of State (SOS). The laws governing the program are in the Arizona Revised Statutes, Chapter 1, Title 41, Article 3. The ACP provides survivors of domestic violence, sexual offenses, and stalking as a way to prevent abusers and potential abusers from locating them through public records. ACP replaces the participant's actual address used in public records and provides them with a "substitute address and confidential mail forwarding services" for use in all public programs.
2. Eligibility for the program is determined by the ACP. Once an individual's eligibility is established, the ACP issues the participant an ACP authorization card which displays their substitute address. The ACP participant is responsible for making use of the card when working with public programs.
3. Arizona law requires all government agencies, including SNAP CAN, to accept the address as the participant's lawful address and to redact (remove) the client's actual address from any record created up to 90 calendar days prior to the card issuance date. SNAP CAN providers must never ask an ACP participant to reveal their actual confidential mailing address. It is against the law for staff to intentionally or knowingly disclose an ACP participant's actual confidential mailing address or phone number.
4. Phone numbers may be recorded and used; however, as stated above, must not be disclosed to any other party internal or external.
5. The ACP provides two critical services:
 - i. A legal substitute mailing address that may be used as a participant's residential, school, or work address.
 - ii. The ACP will receive the participant's mail and will forward the mail to the participant's actual confidential mailing address no later than the next business day.
 - iii. Every ACP authorization card will contain the following:
 - a) Participant's name;
 - b) ACP designated substitute address;
 - c) Date of issuance; and

d) Date of expiration.

6. Participation in the ACP may only be discontinued if:

- a. The ACP participant or the ACP participant's parent or legal guardian, when the participant is a minor or incapacitated adult, requests that DES cease providing ACP protection.
- b. Mail sent to the participant's substitute address is returned as undeliverable.

ARIZONA DEPARTMENT OF ECONOMIC SECURITY

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Revision: 2

Chapter 7: Glossary

- I. This chapter contains acronyms and definitions used throughout the *SNAP CAN Policy Manual*.

A. Acronyms

Acronym	Definition
ABAWD	Able-Bodied Adults Without Dependents
ACP	Arizona’s Address Confidentiality Program
ADA	Americans with Disabilities Act
ADOA	Arizona Department of Administration
CAN	Career Advancement Network
DBME	Division of Benefits and Medical Eligibility
DERS	Division of Employment and Rehabilitation Services
DES	Arizona Department of Economic Security
E&T	Employment and Training
ECDP	Employment and Career Development Plan
FAA	Family Assistance Administration
FFP	Federal Financial Participation
FFY	Federal Fiscal Year
FLSA	Fair Labor Standards Act
FBOA	Financial and Business Operations Administration
FNS	Food and Nutrition Service
ISB	Itemized Service Budget
NA	Nutrition Assistance
PAS	Participant Activity Spreadsheet
QAIA	Quality Assurance and Integrity Administration
SNAP	Supplemental Nutrition Assistance Program
SNAP CAN	Supplemental Nutrition Assistance Program Career Advancement Network

Acronym	Definition
SNAP E&T	Supplemental Nutrition Assistance Program Employment and Training
SOS	Arizona Secretary of State
USDA	United States Department of Agriculture
WDA	Workforce Development Administration

B. Definitions

Term	Definition
Able-Bodied Adults Without Dependents (ABAWD)	An SNAP recipient between the ages of 18 and 49; Physically and mentally capable of working; Not responsible for a dependent child or residing in a household where a household member is under age 18; and Not pregnant.
Activity	A service or program designed to help SNAP recipients gain skills or training, that will increase their ability to obtain regular employment and achieve self-sufficiency.
Case Management	Collectively, comprehensive intake assessments, individualized service plans, progress monitoring, and the assignment of at least one SNAP E&T Program component. SNAP CAN State staff monitor and oversee that case management is being supervised by SNAP CAN providers. All SNAP CAN services must include an Employability Assessment for SNAP CAN participants upon intake. SNAP CAN providers are required to supervise activities through case management.

Term	Definition
Department of Economic Security (DES)	The federally recognized fiscal and administrative agency responsible for the SNAP E&T Program.
Division of Employment and Rehabilitation Services (DERS)	The division of DES that administers the SNAP E&T Program.
Education and/or Training	An activity that engages participants in basic or occupational skills training to improve their reading, writing, and math skills to raise their overall employability. The duration spent in this activity may not exceed 48 months.
English as a Second Language (ESL)	Training that assists participants in their efforts to be more proficient in the English language. Services/training provided may be in a classroom or through individual tutoring.
Employability Assessment	An evaluation of a participant's needs before assignment to an allowable activity. A strong comprehensive assessment collects information about the participant's demographics, educational attainment, basic skills, literacy, family obligations, potential barriers, and work experience.
Employment and Career Development Plan (ECDP)	A written plan completed during the initial SNAP E&T Program intake appointment. The ECDP outlines strategic and incremental steps to achieve identified employment goals. Employment goals must be realistic with consideration to items as identified in the employability assessment and the most current labor market information.
Family Assistance Administration (FAA)	An administration within DBME who administers programs for nutrition, cash, and medical assistance benefits.

Term	Definition
Federal Fiscal Year (FFY)	12-month reporting period, which begins October 1 and ends September 30.
Food and Nutrition Service (FNS)	An agency of the United States Department of Agriculture (USDA), the FNS is the federal agency responsible for administering the nation's domestic nutrition assistance programs and helps to address the issue of hunger in the United States.
General Education Development	Structured activities that may include the use of learning centers, computer labs, and/or other supervised study environments. Participants learn subject matter equivalent to what is taught in high school to earn a High School Equivalency (HSE) Diploma.
Good Cause	Allows a participant to provide a reasonable justification for not failing to meet SNAP and/or ABAWD work requirements. FAA eligibility staff review and determine good cause for non-participation.
Job Readiness Activity	Training that includes instruction topics such as handling workplace conflict, proper business attire and personal care, and juggling family and work responsibilities.
Job Retention Services	An activity that provides participants with allowable support services for a minimum of 30 calendar days and up to 90 calendar days, within a Federal Fiscal Year, after securing employment, even if the SNAP case is closed. Only participants who have secured employment after or during SNAP E&T Program participation are eligible. Allowable support services within the job retention services activity include

Term	Definition
	clothing, equipment, or tools required to do a job, test fees, union dues, licensing and bonding fees, and transportation. Additionally, case management and post-employment counseling/coaching may also be provided.
Job Search Training	An activity that provides participants with assistance in obtaining and maintaining employment. Skills taught to participants may involve teaching participants job-seeking techniques, increasing job search motivation, and boosting self-confidence. Job search training may include job skills assessments and support activities.
Non-transportation related expenses	Provided to participants to assist participation in SNAP E&T Program activities and/or the acceptance and maintenance of employment. Non-transportation related expenses are reimbursements for allowable expenses incurred for participation in the SNAP E&T Program. Reimbursements are not considered income for eligibility purposes.
Participant	A SNAP recipient referred to the SNAP E&T Program, who voluntarily participates in the SNAP E&T Program.
Participant Activity Spreadsheet (PAS)	A DES-approved document used by the SNAP CAN provider to record specific information on each SNAP CAN participant who is served during each calendar month.
Quality Assurance and Integrity Administration (QAIA)	A division within DERS, which monitors the SNAP E&T Program through continuous evaluation and monitoring activities.

Term	Definition
Remedial Education	Activity that provides basic literacy or other basic educational skills not otherwise specified in a classroom or individual setting. This activity is for participants whose reading level is at or below the seventh-grade level or who have demonstrated an inability to participate in program activities due to functional illiteracy.
SNAP CAN Provider	An organization with an approved and current contractual agreement on file with DES for the SNAP E&T Program, known as SNAP CAN in Arizona.
SNAP Recipient	Individual screened by the FAA and determined eligible to receive SNAP benefits.
Supervised Job Search	An activity assigned to participants who are actively seeking employment, where job search activities are directly supervised by SNAP E&T Program staff. Activities include identifying employment opportunities, applying for employment, and attending job fairs. Program staff review activities for efficacy and appropriateness, and provide feedback.
Supplemental Nutrition Assistance Program (SNAP)	Federal program that offers nutrition assistance to eligible low-income individuals and families. In Arizona, it is referred to as the Nutrition Assistance (NA) Program. The federal program is overseen by FNS, a regulatory agency within the USDA.
Supplemental Nutrition Assistance Program Career Advancement Network (SNAP CAN)	A community-based employment and training program for SNAP recipients. The network is composed of authorized DES contractors called SNAP CAN providers who deliver allowable SNAP E&T Program activities to participants. SNAP CAN is administered through the

Term	Definition
	SNAP E&T Program 50/50 local/federal match-funding model.
Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) Program	Program overseen by FNS, a regulatory agency within the USDA. In Arizona, it is referred to as SNAP CAN.
Support Services	Allowable goods and/or services purchased for a participant to successfully engage in or complete an allowable program activity. Support services are designed to assist participants in addressing barriers that restrict participation.
Tableau Referral Report	Tableau is an interface that pulls data from the AZTECS database to allow SNAP CAN providers to verify that a client is receiving SNAP benefits and has been referred to SNAP CAN. In order for a provider to know if a client is on SNAP they must have all of the following: the legal first and last name of the individual, their date of birth, and the last 5 digits of their social security number. All four pieces of personal information must match what is in AZTECS exactly, and they must all match to the same client.
Transportation-related expenses	Provided to participants to assist with transportation expenses incurred as a result of participating in allowable SNAP E&T Program activities. Transportation-related expenses are reimbursements and are not considered income for eligibility purposes.
Vocational Training	Organized educational and/or training programs that must prepare the participant for employment in a current or emerging occupation. Vocational training is provided by educational or training

Term	Definition
	organizations that may include vocational-technical (vo-tech) schools, community colleges, post-secondary institutions, proprietary schools, nonprofit organizations, and secondary schools.
Work Registrant	Individuals who are subject to the Federal SNAP work requirements to maintain SNAP eligibility. Federal SNAP work requirements are reviewed and determined by FAA eligibility staff.